

Law Clerk
IN THE UNITED STATES DISTRICT COURT FOR THE HARRISBURG, PA
MIDDLE DISTRICT OF PENNSYLVANIA

FILED

SEP 26 2001

DERRICK R. COOMBS
Plaintiff

) No. 1:01-cv-0247
(Hon. Judge Rambo)

MARY E. D'ANDREA, CLERK
Per

Vs.

ROBERT W. MYERS, ET AL.
Defendants

REPLY TO DEFENDANTS BRIEF IN OPPOSITION TO
PLAINTIFFS MOTION FOR TEMPORARY RESTRAINING ORDER
AND REQUEST FOR THIRTY DAY CONTINUANCE TO ANSWER

To; The Honorable Judge Rambo, and Judges of this Honorable District Court;

1. Plaintiff has rec. a "brief in opposition" to my motion for T.R.O. from defendants counsel, on September nineteenth, 2001.
2. Plaintiff is unable to form proper reply at this time, because some requested discovery material has yet to be provided by defendants counsel, who has told plaintiff, he is in fact working on this right now. Plaintiff expects this material shortly here.
3. Plaintiff is of the good faith belief, that defendants have been less than honest or forthcoming with their counsel, and does not wish to wrongfully act against defendants counsel, until this matter is ascertained, for certainty.
4. Plaintiff requests thirty day continuance to answer this matter, that he may rec. the discovery in question, be able to formulate a proper answer, and inform defendants counsel, of any dishonesty involved, by pleading, and finding defendants counsel is an innocent victim of deceit, allow such counsel to amend or withdraw his pleading as filed.

WHEREFORE: It is prayed this Honorable Court GRANT petitioner a thirty day extension to answer this matter, that discovery may be provided, and proper answer formulated, and defendants counsel made aware of any impropriety or deceit here.

Respectfully Submitted,

Derrick R. Coombs
Derrick R. Coombs #OT1800
Box 200 Camp Hill Pa. 17001-0200

ORDER

And now, upon consideration of this matter, the request for thirty day extension is hereby GRANTED, that plaintiff may obtain missing discovery, and formulate proper answer to this matter.

BY THE COURT:

HON.

United States District Judge

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA

DERRICK R. COOMBS)
Plaintiff) No. 1:01-CV-0247
) (Hon. Judge Rambo)
vs.)
ROBERT W. MYERS ET.AL.)
Defendants)

PROOF OF SERVICE

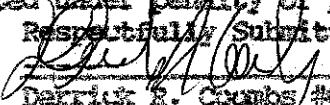
I hereby certify I have this 23rd day of Sept. 2001, served the within "reply to defendants brief in opposition to plaintiffs motion for temporary restraining order, and request for thirty day continuance to answer" on the parties below, by depositing prison mail addressed as follows:

Mr. Patrick Cawley, DAG
Atty. Gen.'s Office, Lit. Sec.
15th Flr. Strawberry Square
Hbg. Pa. 17120
(Five copies)

Clerk of Court; U.S. Dist. Ct.
Box 983, 228 Walnut St.
Hbg. Pa. 17108

Signed in accord with FRCP Rule 11, and submitted under penalty of perjury;

Respectfully Submitted,


Derrick R. Coombs #CT1800
Box 200 Camp Hill, Pa.
17001-0200